

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.

UNITED STATES OF AMERICA

v.

DOMINIQUE WALLACE

No. 3:15-00098
JUDGE TRAUGER



MOTION TO CONTINUE TRIAL

Dominique Wallace, through counsel, respectfully moves this Honorable Court to continue the trial scheduled for November 1, 2016. The reasons for this motion follow:

1. On, July 15, 2016, this case was transferred to this Court's docket from the docket of Chief Judge Sharp. Mr. Wallace is also a defendant in case number 3:15-00140 on this Court's docket which is scheduled for trial on November 15, 2016. Those charges involve Attempted Hobbs Act Robbery, Firearms charges and two co-defendants.

2. The parties in this case have been discussing a possible resolution as to both cases, but a formal plea offer has not been made by the government. Additionally, undersigned has been investigating not only the facts of both cases but a very complex social and psychological history of Mr. Wallace. Undersigned counsel has retained a psychological expert consultant and is working with a social worker who is engaged in obtaining school records, DCS records and school evaluations. The records which comprise Mr. Wallace's social history are extensive, but are necessary in order to provide effective representation.

3. Mr. Wallace is open to a plea resolution, and will consider any plea offer, if made, but is continuing to investigate the case should a trial be necessary. If a plea offer is tendered, additional time would be required to discuss the offer and review it with Mr. Wallace. Since there is additional investigation required to effectively assist Mr. Wallace, a continuance of the trial is respectfully requested.